

# Exhibit B

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**STEVEN E. GREER, MD**

Plaintiff;

v.

**Dennis Mehiel**, an individual **Robert Serpico**,  
an individual, **The Battery Park City  
Authority**, a New York State authority,  
**Howard Milstein**, an individual, **Steven Rossi**,  
an individual, **Janet Martin**, an individual,  
**Milford Management**, a New York  
corporation, and **Mariners Cove Site B  
Associates**, a New York corporation.

Defendants.

CIVIL ACTION NO.

**15-CV-6119 (AJN)(JLC)**

**PLAINTIFF'S FIRST RESPONSES  
and OBJECTIONS to DEFENDANTS'  
SECOND REQUEST for DOCUMENTS**

Steven Greer, pro se  
4674 Tatersall Court  
Columbus, Ohio 43230  
(212) 945-7252  
steve@batterypark.tv

**PLAINTIFF'S RESPONSES AND OBJECTIONS TO  
DEFENDANTS' FIRST REQUEST for DOCUMENTS**

**TO:** Defendants Robert Serpico and The Battery Park City Authority, by and through their attorney of record, Michael Tremonte of Sher Tremonte LLP, located at 80 Broad Street, 13<sup>th</sup> Floor, New York, NY 10004.

Plaintiff Steven Greer ("Plaintiff") serves this first set of Objections and Responses to Defendants' Second Set of Requests for Production under Federal Rule of Civil Procedure 34.

Your second set of requests are literally laughable. You are asking for documents already hashed out in numerous conference calls and meetings with the judge whereby he denied them all (e.g. The HCC data, financial records, etc).

This is my official response to this document request: I refuse to provide any of them. Take it up with the judge.

Moreover, cease and desist any more harassing behavior or I will report you to the Appellate Division disciplinary committee for tampering with witnesses.

Dated: New York, New York  
April 15, 2017

Sincerely

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STEVEN GREER  
4674 Tatersall Court  
Columbus, Ohio 43230  
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To: The BPCA defendants' lawyers of Sher Tremonte LLP and the real estate lawyers of Rosenberg & Estis P.C.